

REMARKS

Status of the Claims

Claims 1, 9, 15, and 17 – Currently Amended

Claim 2-8, 10-14, 16, and 18-22 – Original

Allowable Subject Matter

The Examiner has indicated that claims 16 and 19 are objected to as being dependent upon a rejected base claims but would be allowable if rewritten in independent form including all of the limitations of the base claim and intervening claims. Applicant appreciates the Examiner's indication of allowable subject matter.

Comments under 35 U.S.C. § 112

The Examiner has rejected claim 15 under 35 U.S.C. § 112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Specifically, the Examiner has noted the claim limitation "the step of pre-editing" has insufficient antecedent basis. Applicant has amended claim 15 to indicate that the translating step from claim 9 that appears in claim 15 comprises a pre-editing step. Applicant respectfully submits that claim 15 as amended has a sufficient antecedent basis and overcomes the Examiner's rejection.

Comments under 35 U.S.C. § 103

The Examiner has rejected claims 1, 3, 5, 7, 9, 12, 12, 13, and 17 under 35 U.S.C. § 103(a) as being unpatentable over Lee in view of Hiroi. The Examiner has further rejected claims 2, 6, 8, 11, 18, and 21 under 35 U.S.C. § 103(a) as being unpatentable over Lee in view of Hiroi, and further in view of Lange. The Examiner has rejected claims 4 and 14 under 35 U.S.C. § 103(a) as being unpatentable over Lee in view of Hiroi, and further in view of Kirkland. Finally, the Examiner has rejected claims 20 and 22 under 35 U.S.C. § 103(a) as being unpatentable over Lee in view of Hiroi, and in further view of Lange and Kirkland.

Applicant has amended independent claims 1, 9, and 17 to indicate clearly that the present invention receives closed captioning data from a broadcast program, translates it, and transmits it to a destination program. In view of Applicant's amended claims, Applicant respectfully traverses the rejections. Applicant respectfully submits that the Lee and Hiroi references relied upon by the Examiner to reject independent claims 1, 9, and 17 cannot support the rejection of Applicant's amended independent claims, and therefore, cannot support the rejection of dependent claims 2-9, 20-16, and 18-22 which depend from claims 1, 9, and 17 respectively. It is the Applicant's position the Lee and Hiroi references have deficiencies not addressed by the Examiner and therefore, they cannot support the present rejections.

Lee discloses system equipment for modifying a consumer television set to allow the television viewer to obtain and view translations of character information included in a broadcast signal. The character information from a broadcast signal is transmitted, after it is received at the television set, to a "translation relay site" where it is translated

and returned to the television set. Because the functionality is built into the television set and the translation occurs after the signals are received at the television, the end-user must request the translation and specify the target language for the translation.

In contrast to the teachings of Lee, the present invention is based at a broadcast facility where broadcast signals for a program are received, translated, and then broadcast to a program destination. As a result, Applicant's invention does not require any modifications to the consumer's television set. It also does not require an end-user to specify a target language and request translations using functionality on the television set. With Applicant's invention, the viewer is not required to purchase a special television, which is likely more expensive than a standard television set. The viewer also is not required to specify a target language. The viewer simply chooses whether or not to view the translations that are broadcast to the program destination.

Applicant's amended claims 1, 9, and 17 indicate clearly that the present invention receives broadcast program signals, translates them, and then broadcasts the translated signals to a program destination. Applicant respectfully submits that the Lee reference does not teach or even suggest broadcast of translated data to a program destination and therefore, cannot be combined with Hiroi and the other cited references to support the present rejections.

As the Examiner has noted, the Lee reference does not teach a translation system as applied to closed captioning. Applicant agrees that the reference is deficient in this respect and therefore, it cannot support the present rejections. The Examiner relies on the Hiroi reference to teach translation of closed captioning data. Applicant respectfully submits that the Hiroi reference does not teach translation of closed

captioning data as suggested by the Examiner. Hiroi teaches the translation of teletext data in a video. In other words, Hiroi teaches the translation of subtitles that appear in a video recording. The reference does not disclose any teachings related in any way to closed captioning data, and it does not relate in any way to translation of broadcast data. Applicant respectfully submits therefore, that Hiroi reference adds nothing to the Lee reference and when combined with the Lee reference, does not teach Applicant's invention or render it obvious. Neither reference teaches translation of closed captioning data.

Applicant respectfully submits that the Lee reference does not relate to translation of closed captioning data and has deficiencies not addressed by the Examiner. Applicant further respectfully submits that Hiroi reference does not relate in any way to translation of broadcast signals or closed captioning data, and therefore, does not compensate for the deficiencies of the Lee reference. Applicant respectfully submits therefore, that the Lee and Hiroi references do not support the rejections of amended independent claims 1, 9, and 17, and they cannot be combined with the Lange and Kirkland references to support the rejections of dependent claims 2-8, 10-16, and 18-22.

The present invention provides significant benefits to broadcasters as well as programming viewers. Because the translations are performed on broadcast data and then transmitted to program destinations, the ability for broadcasters to offer translated programming is increased significantly. Broadcasters have the option of providing any of their programs to viewers in more than one language. Viewers who would like to view the programming in a language simply select a programming destination that

provides the programming in the viewer's preferred language. Applicant respectfully submits that the present application is now in condition for allowance and such action is earnestly requested.

Respectfully submitted,

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